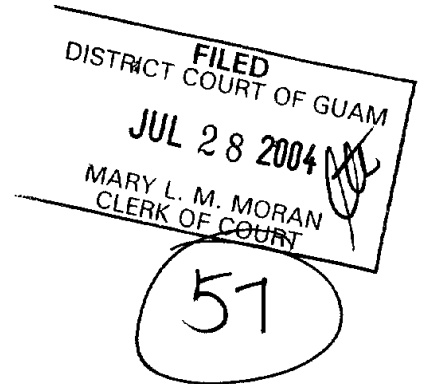


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8 **Attorneys for Petitioner/Intervenor :**  
9 **CHRISTINA MARIE SANTOS NAPUTI**



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IN THE DISTRICT COURT OF GUAM  
TERRITORY OF GUAM

JULIE BABAUTA SANTOS,  
Individually and on behalf of all those  
similarly situated,

Petitioner,

vs.

FELIX CAMACHO, Governor of Guam,  
ART ILAGAN, Director of Department  
of Revenue and Taxation, LOURDES M.  
PEREZ, Director of Department of  
Administration, and GOVERNMENT  
OF GUAM,

Respondents,

CHRISTINA M. S. NAPUTI,

Petitioner/Intervenor.

Docket No. Civ.04-00006

**PETITIONER/INTERVENOR  
NAPUTI'S MOTION FOR  
LEAVE TO FILE REPLY TO  
PETITIONER SANTOS'  
OPPOSITION TO  
APPLICANT FOR  
INTERVENTION NAPUTI'S  
MOTION TO INTERVENE IN  
EXCESS OF TEN PAGES with  
MEMORANDUM OF POINTS  
AND AUTHORITIES.**

*Class Action*

~~~~~  
J.B. Santos, et al. v. Governor F.P. Camacho, et al., CHRISTINA M. S. NAPUTI, Petitioner/Intervenor.  
PETITIONER/INTERVENOR NAPUTI'S MOTION FOR LEAVE TO FILE REPLY TO PETITIONER  
SANTOS' OPPOSITION TO APPLICANT FOR INTERVENTION NAPUTI'S MOTION TO INTERVENE IN  
EXCESS OF TEN PAGES with MEMORANDUM OF POINTS AND AUTHORITIES. Civil Case No. CIV04-  
00006

1                                   \* \* \* **MOTION FOR LEAVE TO EXCEED TEN PAGES** \* \* \*

2  
3                   COMES NOW Petitioner/Intervenor CHRISTINA M.S. NAPUTI through her counsel  
4 VAN DE VELD SHIMIZU CANTO & FISHER, by Curtis C. Van de veld, Esq., to respectfully move  
5 this Court for leave to file a reply to Petitioner Santos' opposition to Petitioner/Intervenor  
6 Naputi's motion to intervene, in excess of ten (10) pages, pursuant to District Court of Guam  
7 Local Court Rule LR 7.1(g). This reply is supported by the following memorandum of points  
8 and authorities, the documents and pleadings on file, and such other further evidence as would  
9 please the court to allow for submission.  
10

11  
12                                   \* \* \* **MEMORANDUM OF POINTS AND AUTHORITIES** \* \* \*

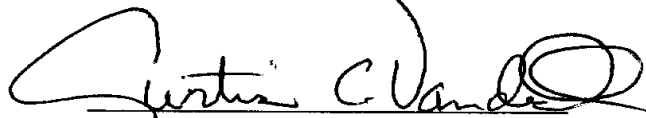
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14                   Only July 23, 2004, Petitioner Julie Babauta Santos filed her *Petitioner's Opposition*  
15 *To Applicants For Intervention Naputi And Torres' Motions To Intervene With Memorandum*  
16 *Of Points And Authorities*, a 34-page document devoid any Table of Authorities, in violation  
17 of District Court of Guam Local Rule LR 7.1(g). Petitioner Santos filed an amended  
18 opposition on July 26, 2004, requesting leave of the court to exceed the page limitation.  
19 Petitioner/Intervenor Naputi seeks to reply to the opposition pursuant to FRCP Rules 7, 8 and  
20 11, and District Court of Guam Local Court Rules, LR 7.1, and LR23.1. However, due to the  
21 fact that Petitioner Santos filed such a voluminous opposition replete with thirty-five (35) cited  
22 cases, it is necessary for a thorough examination of the issues raised that Petitioner/Intervenor  
23

24  
25 ~~~~~  
J.B. Santos, et al. v. Governor F.P. Camacho, et al., CHRISTINA M. S. NAPUTI, Petitioner/Intervenor.  
PETITIONER/INTERVENOR NAPUTI'S MOTION FOR LEAVE TO FILE REPLY TO PETITIONER  
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00006

1 Naputi be allowed to exceed the 10-page reply limitation of Local Court Rule 7.1(g). This is  
2 especially true since every single one of the cases Petitioner Santos attempts to use in  
3 argument against Petitioner/Intervenor Naputi are factually inapposite, requiring they each be  
4 specifically addressed. Petitioner/Intervenor Naputi humbly requests she may be permitted to  
5 file a reply of no more than twenty (20) pages in length.  
6

7  
8 Respectfully submitted this 28<sup>th</sup> day of July 2004.

9 VAN DE VELD SHIMIZU CANTO & FISHER

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11 Curtis C. Van de veld, Esq.

12 Attorneys for Petitioner/Intervenor Naputi  
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J.B. Santos, et al. v. Governor F.P. Camacho, et al., CHRISTINA M. S. NAPUTI, Petitioner/Intervenor.  
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00006

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2  
3 **CERTIFICATE OF SERVICE**

4 I, CURTIS C. VAN DE VELD, certify that I caused a copy of the foregoing document  
5 here filed to be served on counsel for the parties and prospective party on July 28, 2004, via  
6 hand delivery at the following addresses:

7  
8 **Counsel for Petitioner**

9 Michael F. Phillips, Esq.  
10 Phillips & Bordallo, P.C.  
11 410 West O'Brien Drive  
12 Hagatna, Guam 96910

**Counsel for Respondents**

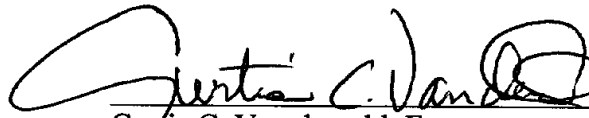
Douglas B. Moylan, Esq.  
Office of the Attorney General of Guam  
Suite 2-200E, Guam Judicial Center  
120 West O'Brien Drive  
Hagatna, Guam 96910

13 **Counsel for Applicant For Intervention Torres**

14 Ignacio C. Aguigui, Esq.  
15 Lujan Aguigui & Perez LLP  
16 Pacific News Building, Suite 300  
238 Archbishop Flores Street  
Hagatna, Guam 96910

17  
18 Respectfully Submitted this 28 July 04

19  
20 VAN DE VELD SHIMIZU CANTO & FISHER

21 

22 Curtis C. Van de veld, Esq.  
23 Attorneys for Petitioner/Intervenor Naputi

24  
25 ~~~~~  
J.B. Santos, et al. v. Governor F.P. Camacho, et al., CHRISTINA M. S. NAPUTI, Petitioner/Intervenor.  
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